

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
Connect America Fund)	WC Docket No. 10-90
A National Broadband Plan for Our Future)	GN Docket No. 09-51
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
High-Cost Universal Service Support)	WC Docket No. 05-337
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
Lifeline and Link-Up)	WC Docket No. 03-109

COMMENTS OF BOX TOP SOLUTIONS, INC.

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Box Top Solutions, Inc. (“Box Top”) hereby submits these Opening Comments in response to the Federal Communications Commission’s (FCC) proposals set forth in its February 9, 2011 NPRM¹ to modernize the Commission’s Universal Service Fund (“USF”) and intercarrier compensation (“ICC”) systems to promote the widespread availability of affordable broadband service to all Americans.

Box Top strongly supports the FCC’s recognition of the importance of universal access to broadband. In particular, Box Top supports the FCC’s proposal to require all existing high-cost funding recipients and all future Connect American Fund (“CAF”) recipients to offer broadband service. Box Top respectfully submits, however, that the FCC’ should broaden its focus from primarily subsidization as a means to encourage broadband deployment, and to an examination of the ways in which innovative technologies may increase access to affordable broadband.

The FCC’s most recent data shows that one in three Americans do not have broadband access to the Internet.² While increasing the availability of broadband facilities is an important step toward universal broadband service, it is not enough to ensure widespread adoption. As the FCC correctly notes, many of the currently unserved Americans lack broadband because they cannot afford a computer, or they do not perceive that access to the Internet is sufficiently relevant to their daily lives to commit to long-term and expensive contracts.³ In order to increase the adoption of broadband, it will be necessary to lower the price threshold, but as the FCC noted it is important not to use public funding to subsidize recipients more than necessary.⁴ Box Top agrees, and submits that in these economically challenged times, it is unwise to rely solely or even largely on high-cost subsidies to support affordable access to broadband. Furthermore, reducing the price of broadband alone will not be enough. The FCC must also address the lack of end-user equipment needed to access the Internet, and encourage development of meaningful,

¹ *In Re Connect America Fund*, et al., WC Docket No. 10-90, Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking, FCC 11-13 (rel. Feb. 9, 2011) (“NPRM”).

² Federal Communications Commission, *Connecting America: The National Broadband Plan* (rel. Mar. 16, 2010), at pp. 23, 167 (National Broadband Plan).

³ NPRM, at ¶141.

⁴ NPRM, at ¶138.

easy to use content and services.

Box Top respectfully submits that the only viable way to connect the unconnected is to encourage carriers to collaborate and partner with entrepreneurs to develop sustainable business models to address all three problems – price, equipment and content. Box Top was founded to find a technology-neutral solution that leverages existing devices frequently found in homes of the chronically unconnected. To address the lack of computers, Box Top has developed a “universal gateway” that combines a modem with the computing elements of a personal computer (CPU, video graphics, memory) to create a very low cost computer without a monitor. The television screen substitutes for a traditional computer monitor, and the key pad on a cellular phone can be used for input if a wireless keyboard would be cost prohibitive.

Applications based on the Android operating system reside on the universal gateway and support local capabilities such as word processing and calendars, as well as remote access to the vast resources available via the Internet, such as distance learning, tele-health, government services and commercial goods and services. These applications (developed using an application development kit provided by Box Top) include a metering function that keeps track of the amount of bandwidth used. The service/content providers reimburse the customer for some or all of the bandwidth costs. Additionally, the FCC should consider enabling consumers to access a certain percentage of the USF/CAF to be used for purchase of broadband.

The Box Top platform for the first time makes it possible to pay for bandwidth in discrete units rather than incurring the costs for an always-on, all or nothing broadband service. By using applications rather than web browsers, providers have a low-cost, dynamic way to create services and content that is tailored (and easily changed) to meet the needs and interests of specific demographics, thereby making the Internet highly relevant to currently unconnected consumers.

Box Top shares the FCC’s view that any effort to increase broadband availability should be technology neutral, and agrees that carriers receiving USF/CAF funds should be encouraged to partner with other carriers (such as wireless or satellite providers) in order to meet their broadband obligations. Utilizing existing resources not only speeds the availability of

broadband, but it is economically efficient. The Box Top technology platform can be used with either DSL or wireless service to access the Internet from fixed locations such as the consumer's home, or the applications can be added to mobile phones.

While reliance on a variety of technologies may mean that there are some differences in performance characteristics from one geographic location to another, such differences are not troubling. Box Top agrees with the FCC's suggestion⁵ that it may be necessary to allow carriers to offer performance tiers, so that consumers with more modest broadband requirements are able to purchase only what they need. Box Top believes it is far preferable to ensure that a basic level of broadband and Internet access is available to all Americans than to attempt to provide everyone with exactly the same level of service. Performance differences exist today even in markets where consumers are able to afford broadband costs without assistance.

In order to encourage the widespread availability of broadband at affordable rates, Box Top respectfully suggests that the FCC should add a requirement that USF/CAF recipients work with technology companies, to the extent possible, to find technology solutions that will reduce the amount of subsidies necessary to provide broadband service to currently unserved consumers. The FCC could also provide substantial assistance by serving in the role of coordinator and facilitator for carriers and technology companies that wish to identify partnership opportunities, perhaps by moving forward with the Accessibility and Innovation Forum, and/or a National Broadband Clearinghouse, as suggested in the National Broadband Plan.⁶

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Respectfully submitted,

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⁵ NPRM, at ¶143.

⁶ National Broadband Plan, at 168.